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Attorneys for Defendant CoinMarketCap OpCo, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Ryan Cox, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

CoinMarketCap OpCo, LLC; BAM
Trading Services Inc. d/b/a Binance.US;
and Does I-X;

Defendants.

Case No. 3:21-cv-08197-SMB

**DECLARATION OF BENJAMIN
M. STOLL IN SUPPORT OF
DEFENDANT
COINMARKETCAP OPCO,
LLC'S REPLY IN SUPPORT OF
ITS MOTION TO DISMISS THE
FIRST AMENDED CLASS
ACTION COMPLAINT**

1 Pursuant to 28 U.S.C. § 1746, I, Benjamin M. Stoll, state the following:

2 1. My name is Benjamin M. Stoll. I am over twenty-one years of age and
3 competent to attest to the facts set forth in this Declaration.

4 2. I am a Shareholder at the law firm Carlton Fields, P.A., 1625 Eye Street, NW,
5 Suite 800, Washington, D.C. 20006. I am a licensed attorney in good standing of the
6 District of Columbia and New York Bars.

7 3. I represent Defendant CoinMarketCap OpCo, LLC (“CMC”) in the above-
8 styled action. The statements set forth in this Declaration are based on my personal
9 knowledge.

10 4. In support of its Motion to Dismiss the First Amended Class Action
11 Complaint, CMC relies on the following exhibits.

12 5. Exhibit 1 is a true and correct copy of the archive I downloaded from the
13 Wayback Machine Internet Archive on October 13, 2025, capturing the website
14 <https://coinmarketcap.com/about> as it existed on September 19, 2020.

15 6. Exhibit 2 is a true and correct copy of the archive I downloaded from the
16 Wayback Machine Internet Archive on October 13, 2025, capturing the website
17 <https://support.coinmarketcap.com/hc/en-us/articles/360043836851-Cryptoasset-Rank> as
18 it existed on September 25, 2020.

19 7. Exhibit 3 is a true and correct copy of the archive I downloaded from the
20 Wayback Machine Internet Archive on October 13, 2025, capturing the website
21 <https://support.coinmarketcap.com/hc/en-us/articles/360043659351-Listings-Criteria> as it
22 existed on September 19, 2020.

23 8. Exhibit 4 is a true and correct copy of the archive I downloaded from the
24 Wayback Machine Internet Archive on October 16, 2025, capturing the website
25 <https://coinmarketcap.com> as it existed on January 1, 2020.

26 9. Exhibit 5 is a true and correct copy of the archive I downloaded from the
27 Wayback Machine Internet Archive on October 16, 2025, capturing the website
28 <https://coinmarketcap.com> as it existed on February 1, 2020.

CERTIFICATE OF SERVICE

I hereby certify that on October 17, 2025, I electronically transmitted the foregoing document to the Clerk of the Court through the CM/ECF system, which will send a Notice of Electronic Filing to all CM/ECF registrants for this matter.

/s/ Andrea S. Tazioli